

**Federal Defenders
OF NEW YORK, INC.**

52 Duane Street-
Tel: (2

**USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 10/26/2022**

David E. Patton
Executive Director

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

October 25, 2022

BY ECF

Honorable Victor Marrero
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: United States v. Leonardo Bueno Coplin
22 Cr. 144 (VM)**

Dear Judge Marrero:

I write, without objection from Pretrial Services or the Government, to request that the Court modify Mr. Bueno-Coplin's bail conditions as follows:

1. Permit travel to the District of Delaware for purposes of work.

On December 8, 2021, Mr. Bueno-Coplin was released on bond with the following conditions: a \$75,000 unsecured personal recognizance bond signed by 3 financially responsible persons; Pretrial Services supervision as directed: home detention with GPS monitoring; travel limited to SDNY/ENY and ED PA (and points in between for purposes of travel; surrender all travel documents; and continue or seek employment. On May 27, 2022, the Court modified Mr. Bueno-Coplin's bail by replacing the condition of home detention with a curfew enforced by location monitoring and by permitting travel to the District of New Jersey for purposes of work. And on September 7, 2022, the Court again modified Mr. Bueno-Coplin's bail by removing the condition of curfew enforced by location monitoring.

Mr. Bueno-Coplin recently secured a new job in Delaware and respectfully requests that his travel restrictions be modified so that he is permitted to travel to the District of Delaware for work purposes. Mr. Bueno-Coplin remains in full compliance with his conditions of release and has provided proof of his employment to his Pretrial Services Officer.

Respectfully submitted,

/s/ Amy Gallicchio

Amy Gallicchio
Assistant Federal Defender
O: 212-417-8728
M: 917-612-3274

Request GRANTED. The Court hereby grants Defendant's request to modify his bail conditions to allow him to travel to the District of Delaware for purposes of work.

SO ORDERED.

10/26/2022

DATE


VICTOR MARRERO, U.S.D.J.